

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Criminal No. 20-cr-40036-TSH
	)	
VINCENT KIEJZO,	)	
	)	
Defendant.	)	

JOINT MEMO RELATED TO FINAL STATUS  
CONFERENCE SCHEDULED FOR APRIL 14, 2022

The United States of America and the defendant, Vincent Kiejzo, hereby submit this joint memorandum addressing Local Rule 116.5(c).

- I. **Local Rule 116.5(c)(2)(A)** The defendant hereby requests that this matter be transferred to the District Court for a pre-trial conference and scheduling order.
- II. **Local Rule 116.5(c)(2)(B)** The government has produced automatic and voluntary, supplemental discovery as required by Fed. R. Crim. P. 16 and Rules 116.1(c) and 116.2 of the Local Rules of the United States District Court for the District of Massachusetts. Discovery was provided on September 10, 2020, November 12, 2020, December 23, 2020, January 13, 2021, March 17, 2021, and July 9, 2021. There are no outstanding motions.
- III. **Local Rule 116.5(c)(2)(C)**. The defendant anticipates filing a motion to suppress on or before June 1, 2022.
- IV. **Local Rule 116.5(c)(2)(D)** The government and the defendant agree that zero days are chargeable against the statutory speedy trial clock. The period from

Kiejzo's first appearance upon his indictment on October 2, 2020 through April 14, 2022, the date currently set for the final status conference, was properly excluded by this Court's prior orders on excludable delay and by 18 U.S.C. § 3161(h)(1)(D) [ECF. 25,33, 37, 44, 48, 62, 70,72,86, 102,124,130,136, 138, 154.] The government and the defendant further agree that the time period between April 14, 2022, and the status conference before the District Judge should be excluded because the parties will use the period of the continuance to complete review of discovery to explore a non-trial disposition of the case, and for the filing of and resolution of pretrial motions. Therefore, the parties request that this Court find that the ends of justice served by excluding the period of this continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (D).

- V. **Local Rule 116.5(c)(2)(E)** Should this case proceed to trial, the parties anticipate that three days will be required. The defendant is not in custody and does not require the services of an interpreter.

Respectfully submitted,

VINCENT KIEJZO,  
By his Attorney

RACHAEL S. ROLLINS  
UNITED STATES ATTORNEY

/s/Sandra Gant  
Sandra Gant  
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P.O. Box 51268  
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By: /s/Kristen M. Noto  
Kristen M. Noto  
Assistant U.S. Attorney  
United States Attorney's Office  
595 Main Street, Suite 206  
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Date: April 12, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by regular mail to the participants who do not receive electronic filing.

/s/ Kristen M. Noto

Kristen M. Noto

Assistant U.S. Attorney

Date: April 12, 2022